

From: Vazquez, Natalia [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3C90404A684241CD8EFA526ED48D9992-VAZQUEZ, NA]
Sent: 9/20/2018 5:25:09 PM
To: Hambrick, Amy [Hambrick.Amy@epa.gov]; Witt, Jon [Witt.Jon@epa.gov]
Subject: RE: NSPS OOOOa annual certification question

Amy and John,

Thanks for getting back to me. The company was asking about the annual report (60.5420a(b)), which is still in draft format and therefore are not required to use and submit through CEDRI. The person that I spoke to wanted to know if

Ex. 5 Deliberative Process (DP)

Natalia Vazquez
Environmental Engineer
Office of Air Enforcement and Compliance Assistance
U.S. EPA Region 3
1650 Arch Street (3AP20)
Philadelphia, PA 19103
215-814-2121

From: Hambrick, Amy
Sent: Thursday, September 20, 2018 1:00 PM
To: Witt, Jon <Witt.Jon@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Vazquez, Natalia <Vazquez.Natalia@epa.gov>; Lundelius, Diana <Lundelius.Diana@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>
Cc: Vyas, Himanshu <vyas.himanshu@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>
Subject: RE: NSPS OOOOa annual certification question

Natalie
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"You must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>)). You must use the appropriate electronic report in CEDRI for this subpart or an

alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §60.4. Once the form has been available in CEDRI for at least 90 calendar days, you must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted.”

Ex. 5 Deliberative Process (DP)

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: Witt, Jon
Sent: Thursday, September 20, 2018 11:58 AM
To: Mia, Marcia <Mia.Marcia@epa.gov>; Vazquez, Natalia <Vazquez.Natalia@epa.gov>; Lundelius, Diana <Lundelius.Diana@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>
Cc: Vyas, Himanshu <vyas.himanshu@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>
Subject: RE: NSPS OOOOa annual certification question

Ex. 5 Deliberative Process (DP)

Let me know if you have any further questions,
Jonathan

From: Mia, Marcia
Sent: Thursday, September 20, 2018 11:49 AM
To: Vazquez, Natalia <Vazquez.Natalia@epa.gov>; Lundelius, Diana <Lundelius.Diana@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>
Cc: Vyas, Himanshu <vyas.himanshu@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>
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past conversations with Jon about the status of the template and CEDRI: <https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/implementation-oil-and-natural-gas-air#report>

OOOOa Reporting

October 6, 2017- EPA posts [template spreadsheet](#) for reporting data required by the 2016 New Source Performance Standards. The 2016 standards include several electronic reporting requirements using the agency's [Compliance and Emissions Data Reporting Interface \(CEDRI\)](#). CEDRI can now collect these reports electronically, although the final template is not available. Until the final template is available in CEDRI, facilities may submit the Annual Report through CEDRI, but also must submit the report to the appropriate address(es) listed in 60.4(a) and (b). Note, facilities are not required to electronically submit the Annual Report until 90 days after the final template has been made available in CEDRI. EPA will update this page when final electronic reporting forms are available.

- [60.5420a\(b\) Annual Report \(Spreadsheet Template\)](#)
- [60.5422a\(a\) Semiannual Report \(Spreadsheet Template\)](#)
- [60.5422a\(b\) Initial Semiannual Report \(Spreadsheet Template\)](#)

Marcia B Mia
Air Branch
Office of Compliance
2227A WJCS
U.S. Environmental Protection Agency
202-564-7042

This message may contain deliberative, attorney-client or otherwise privileged material. Do not release this message without the appropriate review. If you are not the intended recipient, kindly advise and delete this message/attachments.

From: Vazquez, Natalia
Sent: Thursday, September 20, 2018 11:43 AM
To: Mia, Marcia <Mia.Marcia@epa.gov>; Lundelius, Diana <Lundelius.Diana@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>
Cc: Vyas, Himanshu <vyas.himanshu@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>
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Marcia,

In the link below, there is one template that is identified as draft and two available template that are not identified as draft under OOOOa. [Ex. 5 Deliberative Process \(DP\)](#). If we are not yet requiring them to use CEDRI, where is that stated?

<https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri#list>

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From: Mia, Marcia
Sent: Thursday, September 20, 2018 11:37 AM
To: Lundelius, Diana <Lundelius.Diana@epa.gov>; Vazquez, Natalia <Vazquez.Natalia@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>
Cc: Vyas, Himanshu <vyas.himanshu@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>
Subject: RE: NSPS OOOOa annual certification question

Natalie,

Which “final” template are you referring to in the highlight below? There is no final template available so we cannot require its use, yet. Likewise, we are not yet requiring submittal via CEDRI. As for R6’s procedure, that is their own construct to use the mailbox and it apparently works for them.

Marcia B Mia
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From: Lundelius, Diana
Sent: Thursday, September 20, 2018 11:13 AM
To: Vazquez, Natalia <Vazquez.Natalia@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>
Cc: Vyas, Himanshu <vyas.himanshu@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>
Subject: RE: NSPS OOOOa annual certification question

Ex. 5 Deliberative Process (DP)

Diana L Lundelius CHMM
Senior Enforcement Officer
Lean Six Sigma Black Belt
R6 NSPS OOOO/OOOOa Coordinator
Fellow of the Institute of Hazardous Materials Management
USEPA Region 6
Compliance Assurance & Enforcement Division
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Air Permitting Enforcement Section, Mail Code 6EN-AA
1445 Ross Avenue, Suite 1200
Dallas TX 75202-2733
214-665-7468
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Lundelius.Diana@epa.gov
“Courage is the willingness to proceed with positive change, even if the outcome is uncertain.”
Connect with me on Linked In, <https://www.linkedin.com/in/diana-l-lundelius-chmm-a6b98917/>.

From: Vazquez, Natalia

Sent: Thursday, September 20, 2018 9:58 AM

To: Hambrick, Amy <Hambrick.Amy@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Lundelius, Diana <Lundelius.Diana@epa.gov>

Cc: Vyas, Himanshu <vyas.himanshu@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>

Subject: NSPS OOOOa annual certification question

Hi,

I got a question from Cabot Oil and Gas. They are asking if they can submit their NSPS OOOOa annual certification by mail instead of using the CEDRI template, due to the rule being under reconsideration. The facility's contact person sent

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template available for NSPS OOOOa that is finalize due to the rule being under reconsideration?

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